

U.S. DISTRICT COURT  
U.S. BANKRUPTCY COURT  
DISTRICT OF IDAHO

MAY 17 2004

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DISTRICT OF IDAHO

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO**

AHMAD GOLRANGI,

Plaintiff,

vs.

ROMAR ELECTRIC CO., INC. and  
McALVAIN CONSTRUCTION, INC.,

Defendants.

Case No. **CIV 04-225-S-BLW**

**COMPLAINT**

COMES NOW, the Plaintiff, Ahmad Golrangi, by and through his attorney of record, Chris Kronberg of the firm Bowen & Bailey, L.L.P., and for a cause of action against Defendants, hereby states and alleges as follows:

**NATURE OF CLAIMS**

**I.**

This is an action for equitable and legal relief, and for damages against Defendants for violation of Title VII of the 1964 Civil Rights Act, as amended.

## **JURISDICTION AND VENUE**

### **II.**

This action is instituted pursuant to Title VII, 42 U.S.C. § 2000e-5(f)(1) and (3), as amended in 1991. This Court therefore has jurisdiction pursuant to 42 U.S.C. § 2000e-5(f)(3). Venue is proper with this Court pursuant to 42 U.S.C. § 2000e-5(f)(3), as the acts alleged herein occurred within Ada County, Idaho.

## **PARTIES**

### **III.**

Mr. Golrangi is an individual residing in Melba, Idaho. He was born and raised in Iran, and moved to the United States approximately twenty-eight years ago. He was formerly employed by Defendants.

### **IV.**

Romar Electric Company, Inc. is an Idaho corporation in good standing, organized and existing under the laws of Idaho, with its headquarters in Boise, Idaho.

### **V.**

McAlvain Construction, Inc. is an Idaho corporation in good standing, organized and existing under the laws of Idaho, with its headquarters in Boise, Idaho.

## **EXHAUSTION OF ADMINISTRATIVE REQUIREMENTS**

### **VI.**

Jurisdiction by this Court over this action is appropriate because Mr. Golrangi has received a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.

## **FACTUAL ALLEGATIONS**

### **VII.**

Mr. Golrangi is a journeyman electrician, and is a member in good standing of the International Brotherhood of Electrical Workers Local Union No. 291 (the "Union"). He has been a journeyman electrician in the Boise area for many years.

### **VIII.**

On June 23, 2003, Mr. Golrangi received a Referral Slip from the Union stating that he was to report to work for Romar Electric Company, Inc. on that same date.

### **IX.**

Romar Electric Company, Inc. was a subcontractor at the construction site. The general contractor was McAlvain Construction, Inc. Both Romar Electric Company, Inc. ("Romar") and McAlvain Construction, Inc. ("McAlvain") were, for purposes of Title VII of the 1964 Civil Rights Act, as amended, Mr. Golrangi's employers.

### **X.**

On Friday, September 12, 2003, Mr. Golrangi was having a discussion with a foreman in charge of a drywall crew regarding use of the electrical room for an afternoon break. At the time, the drywall crew was working in the electrical room. During this discussion, Allen Lang, a foreman with McAlvain, overheard the discussion. He referred to Mr. Golrangi as a "f---ing Iranian."

### **XI.**

Mr. Lang then made a phone call to Romar regarding Mr. Golrangi. The following Monday morning, September 15, 2003, Romar contacted Mr. Golrangi and terminated his employment against his will and without good cause. The reason given to Mr. Golrangi for his termination was

that his attitude "is detrimental to this project" and that "his further presence will not aid in a harmonious atmosphere."

## **XII.**

Mr. Golrangi was doing nothing wrong to justify the termination of his employment. There is no merit to the reason given for the termination of his employment.

## **VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT**

### **XIII.**

As and for a cause of action against Defendants, violation of Title VII of the Civil Rights Act, as amended, Mr. Golrangi realleges all of the foregoing paragraphs as if fully set forth below.

### **XIV.**

The conduct of Defendants was motivated, at least in part, by their desire to discriminate against Mr. Golrangi. By their conduct, Defendants engaged in unlawful employment practices by discriminating against Mr. Golrangi based on race and/or national origin, all in violation of his rights as protected by 42 U.S.C. § 2000e-5. Such conduct includes, without limitation, Defendants' termination of Mr. Golrangi's employment based on false reasons.

### **XV.**

As a result of the wrongful conduct of Defendants, Mr. Golrangi has suffered damages, and continues to suffer damages, to include, without limitation, back pay, front pay and employee benefits, all in an amount to be proven at trial.

**ATTORNEY FEES  
XVI.**

Mr. Golrangi has been required to retain the services of the law firm of Bowen & Bailey, L.L.P., and is therefore entitled to reasonable attorney fees and costs of suit pursuant to the relevant provisions of law.

**PUNITIVE DAMAGES  
XVII.**

Because the conduct of Defendants was willful and committed with reckless disregard for the legal rights of Mr. Golrangi, he is entitled to an award of punitive damages, pursuant to the relevant provisions of Title VII.

WHEREFORE, Mr. Golrangi requests judgment against Defendants as follows:

1. For compensatory damages, including, but not necessarily limited to, lost wages, (back pay and front pay) and loss of employment benefits, all in an amount to be proven at trial;
2. For prejudgment interest pursuant to law;
3. For reasonable attorney fees and costs of suit;
4. For punitive damages; and
5. For such other and further relief as this Court may deem just and proper under the circumstances.

DATED this 7<sup>th</sup> day of May, 2004.

BOWEN & BAILEY, L.L.P.

  
CHRIS KRONBERG  
Attorneys for Plaintiff